

Response to Comments on Final Public Review Draft Prioritization of Toxic Air Contaminants
Under the Children's Environmental Health Protection Act

July, 2001

Response to Comments on Toluene and Xylene by the American Chemistry Council

The Toluene & Xylene VCCEP Consortium (the "Consortium") of the American Chemistry Council submitted comments in response to the notice regarding the prioritization of the Toxic Air Contaminants (TACs) for the California Children's Environmental Health Protection Act (SB25) in a letter from Courtney M. Price dated July 12, 2001.

[The Consortium has sponsored toluene and xylene under the U.S. Environmental Protection Agency (EPA) Voluntary Children's Chemical Evaluation Program (VCCEP).]

Comment: It's the Consortium's understanding that the Scientific Review Panel (SRP) has recommended that toluene and xylene be added to the list of priority TACs. The Consortium is writing to encourage OEHHA not to make toluene or xylene a Tier 1 or Tier 2 priority and not to undertake any additional reviews of these chemicals until they have been reviewed under VCCEP. The Consortium believes this will avoid an unnecessary duplication of effort and that OEHHA could utilize the review of these chemicals under the VCCEP, which includes an independent scientific peer consultation as part of the review.

Response: The SRP did not recommend including toluene and xylene in the list of five high priority TACs for listing under SB25, nor were they included in either Tier 1 or Tier 2 of the list of candidate compounds proposed by OEHHA. However, because they are listed as Toxic Air Contaminants in California, they will be examined some time in the future under the mandate of SB25. Relevant data from the Voluntary Children's Chemical Evaluation Program or any other peer-reviewed scientific sources should be submitted for consideration at that time.